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**To:** [Hendrickson, Douglas \(ECY\)](#)  
**Cc:** [Jarvis, Mary E](#); [Clement, Curt J](#); [Perry, Jon K](#); [Scott, Bradley W \(Brad\)](#); [Vandervert, Paul J](#); [Peterson, Kirk A](#); [Nuzum, Jennifer L](#)  
**Subject:** Identification of New Toxic Air Pollutant (TAP)--HAMMER Training, Ecology Approval Order DE07NWP-001  
**Date:** Friday, July 20, 2007 1:48:18 PM

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Mr. Hendrickson:

This notification is being provided in accordance with Section 2.3 of Ecology Approval Order #DE07NWP-001 for new training at the Volpentest Hazardous Materials Management and Emergency Response (HAMMER) Training and Education Center:

"Identification of any TAP not previously identified within the NOC Application, as defined in Table 1, shall be submitted to Ecology within 90 days of initiation of use in training with an estimate of annual emissions."

On April 24, 2007, HAMMER initiated the use of vinegar as part of this training activity. The primary ingredient of vinegar is acetic acid (CAS #64-19-7), which is identified as a Class B TAP in WAC 173-460-160. The estimated potential and projected actual annual emissions are shown below, along with the ASIL and corresponding SQER for this TAP.

Potential annual emissions: 0.84 pounds  
Projected actual: .033 pounds  
ASIL: 83 micrograms per cubic meter  
SQER: 10,500 pounds per year, 1.20 pounds per hour

If you have questions or require additional information, please contact me at 376-4876. Thank you.

Tom Beam  
Criteria and Toxic Air Pollutant SME  
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376-4876